

# EXHIBIT A

**Gadre, Susmita**

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**From:** Wish, Benjamin  
**Sent:** Thursday, July 18, 2024 2:12 PM  
**To:** William P. Breen, Jr.  
**Cc:** Miriam Nemeth; Lily Novak; Gadre, Susmita; Rosen, Madison  
**Subject:** Bristol County  
**Attachments:** 2024 07 18 Hodgson Deposition Notice.pdf; 2024 07 18 Wish to Counsel re Deposition Notice.pdf

Hi, Bill.

Please see the attached. Please let us know right away if this date is not workable for you and the witness.

Thank you.

Ben

Benjamin J. Wish (he/him/his)



Todd & Weld LLP

One Federal Street, Boston, MA 02110

Tel: 617.624.4786 Fax: 617.624.4886

[www.toddweld.com](http://www.toddweld.com)

**Gadre, Susmita**

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**From:** Rosen, Madison  
**Sent:** Monday, August 19, 2024 3:12 PM  
**To:** wbreen@eckertseamans.com  
**Cc:** oren@rightsbehindbars.org; amaris@rightsbehindbars.org; Miriam Nemeth; Lily Novak; Wish, Benjamin; Gadre, Susmita; Miriam Nemeth  
**Subject:** Bristol County Deposition Notices  
**Attachments:** 2024 08 19 Bader to Counsel re Deposition Notices.pdf; 2024 08 19 Deposition Notice of Captain Joshua Dube.pdf; 2024 08 19 Deposition Notice of Correction Officer Tracey Perez.pdf; 2024 08 19 Deposition Notice of Lieutenant Jenifer Arsenault.pdf; 2024 08 19 Deposition Notice of Superintendent Steven Souza.pdf

Bill,

Please see the attached. We are well aware of your commitments and September and therefore provided these placeholder dates (as we merely wanted to Notice these depositions).

Can we please set up a call in the next week or so to solidify timing?

Thank you kindly,

Madison F. Bader



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## Gadre, Susmita

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**From:** Gadre, Susmita  
**Sent:** Wednesday, September 18, 2024 10:48 AM  
**To:** Miriam Nemeth; William P. Breen, Jr.  
**Cc:** Wish, Benjamin; Lily Novak; Rosen, Madison  
**Subject:** RE: [EXTERNAL] Re: Bristol County  
**Attachments:** Notice of 30(b)(6) Deposition of Bristol County Sheriff's Office.pdf

Hi Bill,

We write to follow up again on these various discussion points and to see when you have time for a meet and confer.

Additionally, please see attached for the 30(b)(6) deposition notice for BCSO. We look forward to seeing you and your client's representatives on October 24, 2024. Please let us know as soon as possible, but no later than September 27, who those representatives will be.

Thanks,  
Susmita

**Susmita A. Gadre**



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**From:** Miriam Nemeth <miriam@rightsbehindbars.org>  
**Sent:** Tuesday, September 17, 2024 2:14 PM  
**To:** William P. Breen, Jr. <WBreen@eckertseamans.com>  
**Cc:** Gadre, Susmita <sgadre@toddweld.com>; Wish, Benjamin <bwish@toddweld.com>; Lily Novak <lily@rightsbehindbars.org>; Bader, Madison <mbader@toddweld.com>  
**Subject:** Re: [EXTERNAL] Re: Bristol County

Hi Bill,

I'm following up on your email below about getting back to our outstanding questions and concerns yesterday. Can you please circle back on those points and also send us some dates and times for a meet and confer over the next week? Thank you.

Sincerely,

Miriam Nemeth

**Miriam R. Nemeth**

**Gadre, Susmita**

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**From:** Rosen, Madison  
**Sent:** Monday, November 18, 2024 1:52 PM  
**To:** William P. Breen, Jr.  
**Cc:** Wish, Benjamin; Lily Novak; Miriam Nemeth; Gadre, Susmita  
**Subject:** RE: Pillco-Morocho v. BCSO - Further Deposition Dates  
**Attachments:** 2024 11 18 Deposition Notice of Barry Ferraria.pdf; 2024 11 18 Deposition Notice of Bruce Assad.pdf; 2024 11 18 Deposition Notice of Chris Goncalves.pdf; 2024 11 18 Deposition Notice of Doug Monogan.pdf; 2024 11 18 Deposition Notice of Garrett Correria.pdf; 2024 11 18 Deposition Notice of Jonathan Allard.pdf; 2024 11 18 Deposition Notice of Jonathan Baroody.pdf; 2024 11 18 Deposition Notice of Paul Douglas.pdf; 2024 11 18 Deposition Notice of Andrew Sousa.pdf

Bill,

Please see attached for further deposition notices.

All of these dates are negotiable, but we would like to set a meet and confer soon to finalize them. We can do this in between or after some of the depositions later this week if that works for you.

Thank you,

Madison Bader Rosen



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**From:** William P. Breen, Jr. <WBreen@eckertseamans.com>  
**Sent:** Thursday, November 14, 2024 2:52 PM  
**To:** Gadre, Susmita <sgadre@toddweld.com>; Rosen, Madison <mrosen@toddweld.com>  
**Cc:** Wish, Benjamin <bwish@toddweld.com>; Lily Novak <lily@rightsbehindbars.org>; Miriam Nemeth <miriam@rightsbehindbars.org>  
**Subject:** Re: Pillco-Morocho v. BCSO - Finalizing Deposition Dates

Susmita,

Yes, schedule for next week looks correct to me. I'm out of town today and tomorrow but will look at dates for Superintendent Souza upon my return.

Bill

**Gadre, Susmita**

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**From:** Miriam Nemeth <miriam@rightsbehindbars.org>  
**Sent:** Friday, January 17, 2025 1:59 PM  
**To:** Rosen, Madison  
**Cc:** William P. Breen, Jr.; Lily Novak; Wish, Benjamin; Gadre, Susmita  
**Subject:** Re: Bill Please Respond - BCSO Deposition Scheduling  
**Attachments:** Deposition Notice of Joseph Oliver.docx; Deposition Notice of Jeremy Carleton.docx; Deposition Notice of Judy Borges.docx; Deposition Notice of Timothy Melo.docx; Deposition Notice of Ryan Isherwood.docx; Deposition Notice of Filipe DaSilva.docx; Deposition Notice of Mark Amaral.docx; Deposition Notice of Michael Bettencourt.docx; Deposition Notice of Jonathan Sylvia.docx; Deposition Notice of Garrett Soucey.docx; Deposition Notice of Robert Perry.docx; Deposition Notice of Brian Pratt.docx; Deposition Notice of Nelly Floriano.docx; Deposition Notice of Kenneth Almeida.docx; Deposition Notice of William Dillingham.docx

Bill,

Reminder to please send us deposition dates today, or we will follow up early next week with unilateral and firm dates and seek to compel those depositions as needed.

I have also attached an additional 15 deposition notices for which we would appreciate dates. We expect that this final round constitutes the bulk of the depositions we plan to take in this case. Please send us dates for these depositions by next week.

Finally, please send us MS Word copies of the discovery requests you served on the 13th and please let us know which 25 of the Interrogatories you would like us to answer for each Plaintiff. If we do not hear back from you on that front, we will answer the first 25 Interrogatories in each document.

Thank you very much for your time and attention to these important matters. Have a nice weekend.

Sincerely,

Miriam

**Miriam R. Nemeth**

Deputy Litigation Director & Chief Counsel

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*Pronouns: she/hers*

## Plenefisch, Elena

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**From:** Miriam Nemeth <miriam@rightsbehindbars.org>  
**Sent:** Friday, March 21, 2025 2:56 PM  
**To:** Plenefisch, Elena; Ware-Phillips, Jennifer  
**Subject:** [EXT] Fwd: Pillco Morocho v. BCSO deposition schedule  
**Attachments:** 2025 02 11 Deposition Notice of Jonathan Baroody.pdf; 2025 02 11 Deposition Notice of Kenneth Almeida.pdf; 2025 02 11 Deposition Notice of Mark Amaral.pdf; 2025 02 11 Deposition Notice of Michael Bettencourt.pdf; 2025 02 11 Deposition Notice of Nelly Floriano.pdf; 2025 02 11 Deposition Notice of Paul Douglas.pdf; 2025 02 11 Deposition Notice of Ryan Isherwood.pdf; 2025 02 11 Re-Notice of Deposition of Jonathan Sylvia.pdf; 2025 02 11 Deposition Notice of Timothy Melo.pdf; 2025 02 11 Deposition Notice of William Dillingham.pdf; 2025 02 11 Re-Notice of Deposition of Robert Perry.pdf; 2025 02 11 Re-Notice of Deposition of Judy Borges.pdf; 2025 02 11 Deposition Notice of Andrew Sousa.pdf; 2025 02 11 Deposition Notice of Brian Pratt.pdf; 2025 02 11 Deposition Notice of Bruce Assad.pdf; 2025 02 11 Deposition Notice of Chris Goncalves.pdf; 2025 02 11 Deposition Notice of Filipe DaSilva.pdf; 2025 02 11 Deposition Notice of Garrett Correia.pdf; 2025 02 11 Deposition Notice of Garrett Soucey.pdf; 2025 02 11 Deposition Notice of Jeremy Carleton.pdf; 2025 02 11 Deposition Notice of Jonathan Allard.pdf

### Miriam R. Nemeth

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----- Forwarded message -----

From: **Miriam Nemeth** <[miriam@rightsbehindbars.org](mailto:miriam@rightsbehindbars.org)>

Date: Tue, Feb 11, 2025 at 5:08 PM

Subject: Re: Pillco Morocho v. BCSO deposition schedule

To: Lily Novak <[lily@rightsbehindbars.org](mailto:lily@rightsbehindbars.org)>

Cc: William P. Breen, Jr. <[WBreen@eckertseamans.com](mailto:WBreen@eckertseamans.com)>, <[EdwardMeyers@bcso-ma.org](mailto:EdwardMeyers@bcso-ma.org)>, Wish,

Benjamin <[bwish@toddweld.com](mailto:bwish@toddweld.com)>, Gadre, Susmita <[sgadre@toddweld.com](mailto:sgadre@toddweld.com)>, LaMattina, Liana <[llamattina@toddweld.com](mailto:llamattina@toddweld.com)>

Bill,

I'd like to follow up on Lily's email below and confirm depositions for the below dates. I have also attached deposition notices for what we believe to be the remainder of the fact depositions Plaintiffs plan to take in this case, as well as the re-notice of depositions for some of the individuals we're discussing below. Please send over additional dates for these depositions as soon as possible. Thank you very much, and have a nice evening.

Sincerely,

Miriam Nemeth

**Miriam R. Nemeth**

Deputy Litigation Director & Chief Counsel

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On Mon, Feb 10, 2025 at 2:49 PM Lily Novak <[lily@rightsbehindbars.org](mailto:lily@rightsbehindbars.org)> wrote:

Hi Bill and Edward,

To memorialize what we decided on today at the end of Superintendent Oliver's deposition, we'll be taking the following depositions on the dates you provided in late February and early March:

- 2/25 – Mongeon, Perry, or Douglas
  - you noted likely not Mongeon, as he will have just returned from a vacation
- 2/28 – Mongeon, Perry, or Douglas
  - whoever cannot make 2/25, we'll take on 2/28
- 3/6 – Baroody - CONFIRMED
- 3/7 – Borges - CONFIRMED



If you can circle up with Mr. Mongeon, Mr. Perry, and Mr. Douglas, and let us know who you will be producing on 2/25 and 2/28, we will send over subpoenas with the appropriate dates ASAP. I want to make sure we are utilizing all your available times, to be as efficient as possible. If you're able to confirm with Mr. Mongeon, Mr. Perry, and Mr. Douglas today, that would be much appreciated.

Mr. Sylvia has now fallen off the list, since he couldn't make it on 2/25. Can you provide us with dates that work for you to complete his deposition? And can you provide us with one additional date to cover for whomever of Mr. Mongeon, Mr. Perry, and Mr. Douglas does not end up getting scheduled for 2/25 or 2/28?

I'll be back in touch with any addendums to this tomorrow after we meet internally. I hoping we can work together to have this all set before Bill's vacation.

Best,  
Lily

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**Lily Novak**  
Legal Fellow

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*she/her*

**Gadre, Susmita**

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**From:** Lily Novak <lily@rightsbehindbars.org>  
**Sent:** Wednesday, February 19, 2025 3:51 PM  
**To:** William P. Breen, Jr.; EdwardMeyers@bcso-ma.org  
**Cc:** Miriam Nemeth; Wish, Benjamin; Gadre, Susmita; LaMattina, Liana  
**Subject:** Confirming Carlton deposition on 2.28 & other deposition logistics  
**Attachments:** 2025.02.19 Deposition Notice of Belinda Bulgar.pdf; 2025.02.19 Deposition Notice of Gregory Nesse.pdf

Dear Bill and Edward,

I'm writing to confirm that we are moving forward with deposing Lt. Jeremy Carlton on February 28, since we didn't hear back from you on Mr. Douglas's availability. We look forward to seeing you and Lt. Carlton at Todd & Weld on the 28th.

We also think that Lt. Carlton's deposition will be a half day. We are hoping we can fit one more deposition in on the 28th, given you are available on that date. Would you be able to produce William Dillingham on the afternoon of 2/28? We note from your Interrogatory responses that Mr. Dillingham is still employed by BCSO, and so we hope he will be one of the easier deponents to produce.

I am also sending over two more deposition notices, for Belinda Bulger and Gregory Nesse, attached.

Additionally, I wanted to follow up on the need to schedule our outstanding noticed depositions. To date, we have been unable to obtain dates from you for the following six deponents, all of whom were noticed three months ago, on November 18, 2024: Bruce Assad, Christopher Goncalves, Garrett Correia, Jonathan Allard, Paul Douglas, and Andrew Sousa. In addition, we need dates for the following twelve deponents, noticed on February 11, 2025: Jonathan Sylvia, Robert Perry, Kenneth Almeida, Mark Amaral, Michael Bettencourt, Nelly Floriano, Ryan Isherwood, Timothy Melo, William Dillingham, Brian Pratt, Felipe DaSilva, Garret Soucey. Finally, as we've been discussing, we still need a date for the 30(b)(6). That's nineteen previously noticed depositions, plus the two sent today, and the four we have scheduled, for a total of twenty-five noticed depositions in the case that we have yet to take.

We included placeholder dates and times in late February and early March on all of our notices served on February 12th and today, and we will be prepared to go forward at the dates and times noticed. However, given that the Court-ordered discovery deadline is in under a month, on March 14th, and the Court has noted in previous orders that it will be very reticent to extend that deadline, **we would like to work with you to prioritize scheduling the most necessary depositions on this list.** To that end, **below please find a proposed schedule from next week through the end of discovery**, which covers only the depositions we consider the most important. We expect the majority of these depositions to be targeted and short. We have included these shorter depositions as half days, and, for many, we do not anticipate they will even take an entire half-day. Dates we have previously confirmed with you are highlighted in yellow.

Please note, we have skipped 2/26 and 2/27, as you previously informed us you were unavailable those days. If this has changed, or if anyone else from your office is available, please let us know as soon as possible. We are available and are happy to take depositions on those days.

- o Douglas Mongeon: 2/25 - 10am
- o Jeremy Carlton: 2/28 - 9am [Bill, we had set this for 10am, but can we move to 9am to accomodate an afternoon deposition as well?]
- o William Dillingham - 2/28 - 1pm [Bill, can you confirm this additional half-day deposition on 2/28. If Dillingham is not available, can you produce any other K-9 officer on this list?]
- o Jonathan Sylvia: 3/3 - 10am
- o Robert Perry: 3/4 - 10am
- o Paul Douglas: 3/5, 9am
- o Garret Soucey 3/5, 1pm
- o Jonathan Baroody: 3/6 - 10am
- o Judy Borges: 3/7 - 10am
- o Jonathan Allard: 3/10, 9am
- o Chris Goncalves: 3/10 - 1pm
- o Ryan Isherwood: 3/11 - 9am
- o Nelly Floriano: 3/11 - 1pm
- o Kenneth Almeida: 3/12 - 9am
- o Felipe DaSilva: 3/12 - 1pm
- o Michael Bettencourt: 3/13 - 9am
- o Mark Amaral: 3/13 - 1pm
- o 30(b)(6) - 3/14 - 9am

If the above does not work for you, we would like to meet and confer with you as soon as possible to see if we can pin down a mutually agreeable schedule for these outstanding depositions and avoid a motion to compel. **Bill, can you please let us know your availability to meet and confer this week or early next week?** We are happy to accommodate your schedule. If we don't hear back from you within a week, we will be forced to move forward with a motion to compel.

Best,  
Lily

--

**Lily Novak**  
Legal Fellow

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